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ABSTRACT

The Council on Postsecondary Accreditation (COPA) held a professional development program in the spring of 1991, which focused on distance learning and accreditation. This report contains the keynote address, given by Michael B. Goldstein, and six papers from that program. In the first paper, "Distance Learning and Issues of Educational Quality," Paula Hooper Mayhew argues that three concerns should be considered when addressing the requirements of distance education: the nature of teaching as a vocation, the nature of degree-program planning in higher education, and the nature of adult learning styles. In the second paper, "Accreditation and Authorization Issues," Kate Gulliver notes the concerns of and key issues for accreditors, state approving agencies, colleges, organizations, and employers, and offers suggestions to address the issues raised. In the third paper, "The Impact of Distance Learning on the Process of Accreditation," June Lester comments on the impact of distance learning components on the accreditation process, specifically self-study, the site visit, and interim monitoring procedures. In the fourth paper, "Distance Learning: Issues from the Perspective of a State Authorization Agency," Timothy M. Grieder discusses the role of state licensing boards in setting and maintaining state education standards, the interaction between the state and distance education institutions, and the concerns surrounding intrastate distance education. In the fifth paper, "Distance Learning: Implications for Accreditation," Steven Crow discusses the standards and criteria for distance learning and their implications for accreditation. In the final paper, "Summary: Distance Learning and the Implications for Accrediting Bodies and Accreditation," Allan O. Pfnister focuses on the broad concerns of regional and other accrediting agencies. (DB)

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Distance Learning And Accreditation

Professional Development Series
April, 1991

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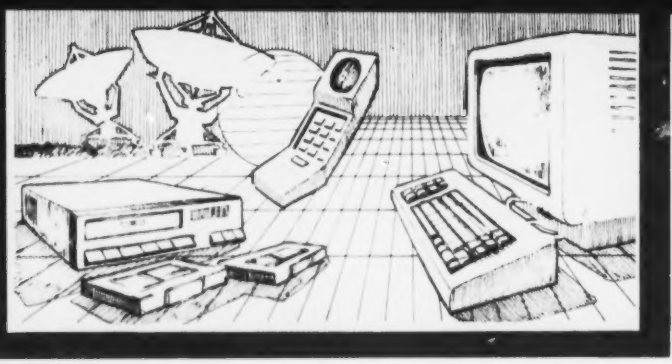

Distance Learning And Accreditation

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Table of Contents

PAGE

Introduction 5

Keynote Address: Distance Learning and Accreditation, *Michael B. Goldstein* 7

Distance Learning and Issues of Educational Quality, *Paula Hooper Mayhew* 18

Accreditation and Authorization Issues, *Kate Gulliver* 22

The Impact of Distance Learning on the Process of Accreditation, *June Lester* 24

Distance Learning: Issues from the Perspective of a State Authorization Agency, *Timothy M. Grieder* 28

Distance Learning: Implications for Accreditation, *Steven Crow* 31

Summary: Distance Learning and the Implications for Accrediting Bodies and Accrediation, *Allan O. Pfnister* 35

■ Introduction

Worldwide, distance learning is an increasingly important mode for delivering education to the masses. New technology has helped meet new social and economic needs by offering alternatives to classroom teaching. In the early 1980's, COPA and the State Higher Education Executive Officers (SHEEO) secured a multi-year grant from the Fund for the Improvement of Postsecondary Education to study the issues related to distance learning via telecommunications. The project yielded principles and polices related to distance learning, including off-campus educational activities.* A decade later, COPA revisited the issues dealt with by the accrediting bodies and state authorizing agencies and evaluated them given current practice in distance learning. The result was the Spring 1991 Professional Development program on "Distance Learning and Accreditation."

Distance Learning and Accreditation contains the keynote address given by Michael B. Goldstein, partner at the law offices of Dow, Lohnes and Albertson, Washington, D.C., and the presentations made by Steven Crow, Deputy Director of the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools, and Paula Hooper Mayhew, Associate Director of the Commission on Higher Education, Middle States Association of Colleges and Schools, at the April 1991 program.

Also in this monograph are brief papers containing the salient points made by the panel on "Distance Learning and Accreditation and State Authorization Issues." Moderated by Kate Gulliver, Director of the Institute of Distance Learning at Regents College, the panelists were June Lester, Accreditation Officer of the American Library Association, Timothy M. Grieder, Director of the Colorado Commission on Higher Education, and Steven Crow of the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools.

Concluding the publication is a summary of what distance learning means to education and accreditation by Allan Pfnister, Professor Emeritus at the University of Denver.

This monograph, *Distance Learning and Accreditation*, is the fourth in a series featuring papers and dialogue presented at COPA Professional Development Sessions.

—Marjorie Peace Lenn
Vice President

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* The October, 1985, *Assessing Long Distance Learning Via Telecommunications, PROJECT ALLTEL: A Summary Report*, a joint COPA/SHEEO publication, is available, prepaid, for $9.50 from the COPA office. Quantities are limited. The resulting policy statement, "Accreditation and Authorization of Distance Learning Through Telecommunications," adopted by the COPA Board October, 1984, is available at no cost.

■ Keynote Address: Distance Learning and Accreditation

Michael B. Goldstein

It is truly a pleasure to help begin today's program on the accreditation of distance learning. My interest in this subject has a historical derivation. Let there be no mistake that I am an advocate of distance learning, and more particularly distance learning through the use of telecommunications technologies. Indeed, I have the distinct pleasure of serving as counsel to a number of institutions and organizations that are active in this field, including several of those that you are examining more closely in the course of this program.

A turning point in my involvement, however, dates to the mid-1980s, and a dinner during which I was seated between the then head of COPA, Dick Millard, and Gordon Davies, the Director of the State Council for Higher Education in Virginia. For reasons lost in the mists of history, the course of discussion turned to what was then seen as a rising tide of distance learning services, propelled forward on the shoulders of rapidly evolving technologies. The Public Broadcasting Service was beginning to make a success of its Adult Learning Service (ALS), the American Open University, headed by Don McNeil of University of Mid-America (UMA) fame, was poised to seek a nationwide constituency, and an upstart engineering educator named Lionel Baldwin had launched a satellite-based graduate-level program in engineering, audaciously called National Technological University.

Sipping our coffee - at least I think it was coffee - we had visions of a great wave of technology-based distance learning that was soon going to overtake American higher education. The delivery of postsecondary instruction without regard to the geographic location of either the student or the providing institution was becoming a reality, yet the structures for regulating such services and ensuring their quality were rooted in nineteenth century institutional models. We contemplated the problems that had arisen in the sixties and seventies when a rash - some would say a plague - of what were called extension centers blossomed throughout the land, and the frantic catch-up game that accrediting bodies and state higher education agencies were forced to play to regain the control that was thought to be needed. We reflected that what emerged from that process was probably more restrictive and punitive than it might otherwise had been - and therefore more limiting in terms of options for learners and institutions - because the rules and policies were reactive, intended to cure active problems rather than direct public policy. We agreed that the new forms of distance learning that were emerging were too promising, in the context of what they could do to enhance the quality of and access to postsecondary education, to be impeded by hastily erected barriers. At the same time, we had visions of unscrupulous entrepreneurs launching their so-called educational services from the less regulated jurisdictions, or even from offshore outposts, and spreading them via satellite or other means across the nation beyond the reach of those charged with protecting the public interest.

How, we mused, could a balance be struck between the need for effective regulation and quality control on the one hand and the encouragement of innovation in the delivery of educational services in hitherto unimagined ways?

Naturally, being involved in education, we decided on a study! Out of that meeting emerged Project ALLTEL, an acronym for Assessing Long Distance Learning

Via Telecommunications. Project ALLTEL was created as a joint effort of COPA and SHEEO to get ahead of that giant wave, to avoid repeating the errors of the past when accreditors and regulators alike found themselves unable to adequately respond to changes in the environment they were charged with regulating.

Over a period of two years, with the financial support of the Fund for the Improvement of Postsecondary Education (FIPSE), a policy board, three task forces and a committee struggled to deal with the inextricably intertwined issues of the licensure and accreditation of telecommunications-based distance learning. Naturally, since this was a joint project of COPA and SHEEO, one task force looked at the accreditation issues and an entirely separate task force looked at the state authorization concerns. A third, truly joint task force considered the thorny legal issues arising out of attempts to control and regulate this arena. There was also a Technology Advisory Committee to help educate the ignorant heathens who happened to comprise the three task forces as to what actually seemed to be evolving in the field.

In October, 1985, COPA and SHEEO proudly issued the *Project ALLTEL Report.* The report contained a thoughtful "Statement on Accreditation and Authorization of Distance Learning Through Telecommunications," a document that was subsequently formally endorsed by both sponsoring organizations, and an "Institutional Profile for Telecommunications Instruction," a template that, it was hoped, could be used to enable accreditors and state licensing agencies to apply common measures to the evaluation of telecommunications-based distance learning activities.*

The last paragraph of the introduction to the *Project ALLTEL Report* is illuminating:

> The Project was an effort to bridge developments in the use of technology in delivering higher education services with the traditional roles and responsibilities of state agencies, accrediting bodies, and institutions. The effort was to develop before these delivery systems were in place a set of reasonable and coherent policies which would ensure the growth and development of the technology while, at the same time, ensuring its quality.

That statement was followed by a quote from a chapter I had written in a compendium on "The Expanding Role of Telecommunications in Higher Education." It was with supreme confidence that I made the following prediction:

> The confluence of telecommunications and adult learning will result in a new set of policies that are increasingly based on an evolving marketplace approach, punctuated by the evolution of interstate agreements for the approval of delivery systems that operate on regional and national - and perhaps international - bases. The outlines of such agreements are already becoming apparent, as institutional, state and accrediting agency leaders seek to develop a framework for these programs while they are still in their infancy.

Clearly, I was both younger and wiser then. Today, a half-decade after the issuance of the *Project ALLTEL Report*, we are again gathered to visit the issue of the accreditation and authorization of distance learning. We have the Project ALLTEL "Statement of Principles" and we have the "Institutional Profile." What we manifestly do not have are the agreements - whether interstate, interregional or international - that were seen as the logical, indeed inexorable, outcome of the maturation of technology-based distance learning. It is also interesting, and perhaps in part ex-

plains the *lack* of such accords, that in the intervening period there have been precious few "horror stories" arising out of technology-based learning. Unlike the sixties, when off-campus programming - some of which was of questionable quality - exploded in a virtually unregulated environment, we have witnessed a much more orderly development of technology-based programs. Notwithstanding my remarkable ability to foretell the future, there are still only a small number of efforts that have sought to transcend state lines. PBS's Adult Learning Service, for example, provides programming to local institutions that largely operate within their local jurisdictions under the authority of their own accrediting and licensing bodies. Those that have gone interstate, such as the National Technological University and Mind Extension University/The Education Network, have been developed with what might be termed an *over*abundance of caution. Even so progressive a region as the one in which we presently sit is only now moving - albeit with considerable vigor and imagination - to develop an interstate model for educational telecommunications.

This poses an interesting question: have we been spared the charlatans because our regulatory environment carefully filters them out, or have we maintained so oppressive a regulatory regime that few dare challenge it - quite regardless of the quality of their offerings? I suggest that this is a key question for accreditors and state authorizing agencies alike. If the former is the case, we should all be proud of the effectiveness of our system. If it is the latter, however, then what we are accomplishing is the denial of educational opportunity at precisely the time when this nation can least afford such impediments.

It seems to me useful to address this issue in the context of the regulatory framework of distance learning. Of course, it is impossible to discuss the interface between distance learning and accreditation without reference to a wide variety of legal issues, some of Constitutional import. Indeed, it should be obvious to all of us - painfully obvious to some - that the law generally is a very integral part of what accreditation and its inseparable counterpart, state authorization, are all about. Certainly that is the case with the latter: after all, states derive their power to regulate postsecondary education through the enactment of legislation and the promulgation of regulations rather than by divine intervention - although I suspect there are some who either believe in or at least hope for the latter.

We like to think of accreditation as fundamentally different. We emphasize the prefatory term "voluntary" whenever accreditation is discussed, perhaps as something of a shibboleth to ward off the presumed indignities of being linked with the clearly compulsory nature of state authorization - and, more to the point, being considered an express adjunct of the powers of the state, be it federal or otherwise, with all that implies in terms of both procedural requirements and substantive remedies.

Of course we all know that the voluntary nature of accreditation - at least institutional accreditation and in many professions specialized accreditation as well - is more illusion than reality. Certainly the longstanding linkage by the Congress between status with a recognized accrediting agency and access to most forms of Federal funding - and most particularly student financial aid - is sufficient to make such status far from an honorific exercise. Likewise, the reliance on accreditation by most state authorizing bodies as well as by professional licensure boards makes the gaining and holding of status a matter of institutional survival.

But you know all this, and you certainly do not need me to remind you of the contentiousness that often surrounds the accreditation process, and the frequency with which status decisions become the grist of lawsuits. Indeed - and I am probably courting disbarment if not dismemberment for taking this position - I believe that the legitimate academic concerns of accreditation - that is, the encouragement and preservation of quality - have been compromised by what appears to be the ever increasing contentiousness of the process of accreditation. Lawyers and judges ought not be making accrediting decisions, any more than Congress or state legislators ought to establish standards of academic quality. Yet it is patently clear that more and more decisions are either being made by persons and institutions extrinsic to the accrediting community - or by accreditors with one eye on the courtroom door and the other on their attorneys' last bill.

I believe this has a great deal to do with the issue of the accreditation - and inseparably, the licensure - of distance learning, and of how this pedagogy has developed and is going to develop in the coming years.

I think it is useful to return to the *Project ALLTEL Report* and contemplate what the Legal Task Force had to say about regulating distance learning:

> The legal issues surrounding the interstate delivery of telecommunications-based higher education are both many and manifestly uncertain. The paucity of legal precedent leaves unanswered such fundamental questions as whether a state can exercise its power to regulate a telecommunications-based provider, how that power can be exercised and what are the basic rights of the learner and of the institution. It is clear that a state has only limited authority to regulate the telecommunications medium, but rather more power to regulate the institutional provider - assuming of course that the institution had created sufficient "physical presence" within the state to trigger its own authorization statute.

The Legal Task Force concluded its report with the observation that the legal setting was still - and I quote - "fluid and uncertain." The primary, but certainly not the only, problem concerns the inherent conflict between the Commerce Clause of the Federal Constitution, which reserves regulation of interstate commerce to the Federal government, and the Reserved Powers Clauses, which has traditionally been interpreted to having left the regulation of education to the states. Can a provider of distance learning services via telecommunications be barred by a state from bringing those services across its borders, particularly when the only physical manifestation of that provider in the state is an electronic signal? Seeking to control the content of a television transmission emanating from within one's state, even for the laudatory purpose of protecting the consumer, would unquestionably provoke a Constitutional controversy. Trying to do so to an extra-state source would be exponentially more difficult. If nothing else, enforcement would prove virtually impossible. One state official waggishly suggested chartering one of UMA's old DC6's and sprinkling metal chaff along his state's borders to block out the offending signals.

The application of the antitrust laws to distance learning also posed - and continues to pose - significant questions. Can delivery of educational services via a particular modality be constrained to protect local, traditional institutions from what they might - perhaps accurately - perceive as rapacious competition? We are all starkly aware of the vulnerability of higher education to the antitrust laws: the present Department of Justice investigation into tuition and admission policies will be ex-

traordinarily costly even if no adverse action is ever taken.

Finally, there is the question of what the Task Force called "physical presence." At what point, the members asked, is a technology-based distance learning service sufficiently *present* in a state to give that state the right to control its conduct? The answer was unclear then, and remains so today.

The ALLTEL task forces and then the policy board struggled longest with the issue of physical presence. We ended up describing a continuum, ranging from what we all agreed *would* constitute "sufficient" physical presence: that is, the presence within the jurisdiction of actual faculty of the offering institution who are directly engaged in the instruction of students. We thought we could describe the opposite extremity: the beaming of an electronic signal into the jurisdiction that could be used by learners without further intervention by the providing institution. But proving the negative is always perilous, and in this case we could not do any more than suggest that since most distance learning programs would fall somewhere in between the two extremes, continued study would be needed to define - let alone decide - the issue.

The programs examined yesterday are prime examples of this ambiguity. Neither National Technological University (NTU) nor Mind Extension University (MEU) sent faculty into the field. In both cases, an electronic signal reaches a learner at a location other than a campus or, in the traditional sense, an extension site. The electronic signal in question flows through protected media: satellite transmission in the case of NTU and both satellite and local cable carriers in the case of MEU. To be sure, in both of these cases there is *something* present within the boundaries of a jurisdiction: a corporation that has contracted for NTU's services or a cable carrier taking the MEU channel and sending it along to its subscribers. But are either of those enough to trigger jurisdiction? The Project ALLTEL legal task force could not decide, and arguments rage to this day in favor of and against possible positions.

A further complicating factor when one seeks to understand physical presence turns on the question of *what* is present. The evolution of distance learning, particularly but certainly not exclusively through the use of technology, has seen the development of three distinct types of providers:

- There are the traditional institutions with non-traditional programs, such as Emporia State University.
- There are the non-traditional institutions, like Empire State University or NTU.
- There are the non-institution providers, such as MEU or Xerox, that serve as *conduits* for the instructional programming of other institutions, generally although not uniformly, for the benefit of employees of a single company.

Accrediting organizations and state authorizing agencies historically have dealt with the first category - the traditional schools with non-traditional programs - and are just now beginning to learn how to deal with the non-traditional institutions. But there is no meaningful precedent for dealing with non-institutional providers, within whatever context they might fall.

I am convinced that this uncertainty is contributing to the still-modest growth of distance learning. Few institutions would be so foolish as to invest in a new campus without firm assurance that it could open and operate. Yet that same uncertainty

pervades distance learning. Potential providers of distance learning services may entirely abjure entering the field - or a particular jurisdiction - or they may tailor their program specifically to avoid the risk of triggering a costly jurisdictional contest. Yet it is precisely the latter conduct that can be so detrimental to the growth of effective distance learning, since it superimposes on sound academic judgment an overlay of legal caution, the net result of which may be less than the most desirable programmatic approach. The best practice becomes hostage to the least legal risk.

Indeed, it is a tribute to visionaries like Glenn Jones and Lionel Baldwin that they have been willing to set sail on these uncharted waters. Of course, they have some pretty good lawyers. I have already stated my conviction that accreditation and licensure decisions ought not be made by lawyers and judges. But rest assured that my brethren and I are fully prepared to step into the breach if rights - on either side - are being trampled. The burden here is to deal with the issues of control of distance learning offerings *within* the bounds of the protections afforded by our legal system. One pedagogy ought not be singled out for different treatment simply because it is more competitive or otherwise different.

Let me pause here for a moment and emphasize my use of the term pedagogy in relation to distance learning. Distance learning is a way - or more correctly, a wide variety of ways - of *delivering* educational services to a learner population. It is a content-neutral term: the quality of a psychology course is not dependent upon the *mode* of delivery - let us say so-called "live" lecture versus a telecourse - but rather upon the course content and the *manner* of delivery. Indeed, I suspect we have all sat through traditional classroom presentations that have had all the excitement and intellectual stimulation of a television test pattern, and we have seen and perhaps participated in technology-based distance learning - the telecourse-oriented Civil War series on PBS is one striking example - that drives the concept of learning to new heights.

In the context of considering the issues surrounding the accreditation of distance learning, I believe it is essential that we step back from thinking of distance learning - and particularly technologically-based distance learning - as something that is fundamentally different from what we insist on calling "traditional" instruction. A telecourse is no more different from a "live" lecture before 300 students than that lecture is from a one-on-one tutorial. We need to steer clear of the intellectual trap that leads us to believe that distance learning is so inherently different from what we have come to define as traditional instruction that either it demands entirely different rules - which we are then unwilling or unable to promulgate - or it cannot possibly meet the established standards and therefore it is not worth fixing. Although neither is the case, experience shows that this reaction is painfully common.

To be sure, distance learning may not be appropriate for some types of educational programs, although with advances in technology those exceptions are becoming few. A common example offered in opposition to the expanded use of distance learning is the absence of what is termed "hands-on" experience. But if we look at today's college campus we are finding that more and more students are performing their chemistry and physics experiments before computer keyboards instead of laboratory benches. The experiments are more elegant, the learning more exacting, and, incidentally, the risk of levelling a campus building as a result of an injudicious

mixture of chemicals dramatically reduced. Extending that opportunity to students engaged in distance learning is within the scope of today's technologies: it will be commonplace tomorrow.

Another oft-voiced complaint is that distance learners fail to receive the benefits - intangible though they may be - that are assumed to accrue from personal interaction between and among faculty and students. To a degree that lack of direct interaction - at least the group face-to-face variety of interaction - is certainly an inherent characteristic of distance learning. But do we know the true implications of having or not having such interactions on various program and subject matters, and do we have any clear notion of the compensating effects of such alternative forms of interaction as computer conferencing and interactive video? Have we any understanding of the significance of such interactions on different types of students, from traditional undergraduates to mid-career adults? I am quite certain that the move from the tutorial to the lecture that accompanied the rise of the modern university was greeted with similar outcries. I am equally certain that the differences in learning outcomes are as overstated today as they were then.

From a regulatory perspective - and accreditation is of course a form of regulation, albeit without the absolute imprimatur of government behind it - the treatment of distance learning as a set of delivery systems is central to the formulation of an appropriate framework. If we are to remain faithful to what I believe is finally becoming the dominant concept of accreditation as relying on outcome rather that process measures - that is, achievement of measurable learning instead of bean-counting library books - we need to be able to decouple the measurement of the quality of education provided through a distance learning modality - or any pedagogy - from the nature of the modality itself. Does it matter, I submit, whether a subject is mastered through the use of a computer verses direct interaction with an instructor, so long as the subject is indeed mastered? While we are still only imperfectly able to measure outcomes, that does not mean that we must continue to rely on outmoded or irrelevant process measures in their stead.

Distance learning, and particularly distance learning that relies on technology for its delivery, is very clearly an increasingly strong force in American higher education. Last academic year, for example, nearly *60 percent* of American colleges and universities licensed telecourses through the PBS Adult Learning Service. That is 1800 institutions. More to the point, this number represents a remarkable increase in the use of technology-based courseware delivery over the past decade. While not all of these institutions use telecourses in a distance learning mode, a great many do.

Another interesting statistic is that *96 percent* of the nation's public television stations broadcast college-level telecourses. Now, with the establishment of Mind Extension University, hundreds of cable systems throughout the nation have become vehicles for the delivery of college level courses - from institutions as diverse as Colorado State and Maryland - directly to the home or business. Add to that the major corporations that contract with NTU to provide graduate level instruction and it becomes apparent that the camel's nose is indeed well inside the tent.

Of course, the enrollment in these courses is not proportionate to the number of institutions offering them or public TV stations putting them on the air. In fiscal 1990, PBS reported an enrollment of a little over 250,000 students in ALS telecourses, a relatively small proportion of the thirteen million students enrolled in American

postsecondary education. NTU's enrollment is obviously quite limited, and MEU is just beginning to broadly market its service in conjunction with its participating colleges. But the fact that telecourse enrollment alone has increased fivefold in less than ten years is significant in offering a portent of what the future may hold.

There are several factors that are influencing the development of distance learning as a way of delivering postsecondary education. The first is need. There has to be a market for distance learning else no institution would bother with it. That such a market exists, and exists in massive numbers, has been documented in many studies - although I think by now we have all learned the lesson that far more people are willing to tell a pollster that they would enroll in a distance learning course were it offered than ever actually take the plunge.

Part of this demand is simply the result of demographics: an aging population, engorged by the baby boomer bubble, is increasing the demand for educational services that differ from traditional classes in traditional settings at traditional hours. Part of this demand arises from a growing need to train and - perhaps even more critical - to *retrain* a workforce to deal with the rapidly changing workplace requirements of the nineties and beyond. Part of the demand is also rooted in economics: distance learning can be significantly less costly *to the learner* than its traditional counterparts. Profiles of distance learning enrollments support the demand side interpretation: students enrolled in distance learning programs are older, substantially more likely to be employed full time, and, interestingly, more likely to be female, than their campus-bound counterparts.

The other side of demand is supply, and here there has clearly been an incentive for institutions to expand their involvement in distance learning activities. While the number of adults seeking postsecondary education and training increased significantly in recent decades, the number of adolescents in the population has, as an absolute number, shrunk. Simply put, the available market of traditional college age students has been declining in recent years, and that decline is going to continue until the latter half of this decade. Yet college enrollments have not reflected the magnitude of this decline, and for the most part have continued to rise, at least until the present academic year, when the long predicted turndown seems to actually be upon us. What has been the source of bodies to replace the declining cohort of traditional eighteen to twenty-two year olds? Adult learners, precisely the population for whom distance learning may be an attractive mode of instruction.

In looking at the issue of distance learning and its regulation, one cannot ignore the issue of competitiveness. Although the term is sometimes used as though it was an epithet, in the present environment competition among institutions has become heated, reflecting in no small measure a sense that the market is unlikely to support every school regardless of its competitive position.

Unfortunately for the marketers, however, postsecondary education is an arena where product differentiation is limited: beyond the elements of prestige, location and cost, what are the marketable differences? Most institutions cannot, in the near term, do much about their perceived prestige, and, of course, their location for traditional modes of delivery is relatively fixed.

Even cost is less flexible than one might think. I recall a meeting a few years back, during the height of the outcry over escalating college costs, when the president of a small distinguished liberal arts college arose and announced to a stunned audience that he had to keep his tuition high to maintain an image of selectivity

and prestige. If he reduced his tuition, he went on to say, he would be out of step with the schools with which his was seen as directly competing, and that would cause students and parents to conclude that his school was not *academically* competitive with that group! The audience was stunned, I hasten to add, not because of the audacity of such a position, but that a president had actually stood up in a public forum and said what everyone knew to be the case.

Marketing postsecondary education is not all that different from marketing cars: cachet seems to mean as much as substance. Since distance learning can be promoted separately from regular on-campus programs, institutions can be more price sensitive and employ more aggressive marketing strategies. They can also reach potential students in ways that differ from the traditional approaches of high school interviews and recommendations. It is one thing to place an advertisement in a Sunday newspaper education supplement extolling the virtues of one's program; it is quite something else having that program available at one's place of business, on channel 20 of one's television, by dialing a number into a computer modem pool, or popping a videocassette into one's player. Traditional institutions could try to differentiate themselves by scheduling courses at more convenient hours and using extension centers, but those are trivial accommodations compared to what can be accomplished through distance learning modalities. Is this competition, some have asked, or is it predatory behavior? The view depends very much on where one sits.

Another major factor is obviously the evolution - some would say revolution - in the technologies that support distance learning activities. It is certainly the case that the technologies that are available today to deliver educational services into the home, school and workplace are significantly superior to those that were available only a few years ago. The rapid growth of terrestrial and satellite networks, the expanding capacity and speed of computer systems, the advent of direct satellite services and, of course, the remarkable spread and now near-saturation of videocassette recorders, all at remarkably *declining* costs, have reshaped the capacity of institutions to deliver educational services to an ever-widening clientele. The exchanges of information that are being made possible by the establishment of technology-based networks and systems are truly mind-boggling, and the implications are every bit as significant for traditional institutions as they are for those that are immersed in distance learning. One need only look at the rapid emergence of state-wide telecommunications networks to get an idea of the growing pervasiveness of technology in the delivery of postsecondary education.

But we must be careful not to assume that the pace of technological change alone is going to reshape postsecondary education, at least in the relatively near term. One need only recall the prescience of those who hailed the development of television as marking the end of the traditional classroom. To be sure, advances in technology *are* changing the face of all education, and not just distance education. But the last fifty years have proven that technology *alone* is not going to remake postsecondary education. Technology is a tool, albeit an enormously powerful one, yet the question remains: how is that tool going to be used, what are the incentives for its use - and, conversely, what are the *dis*incentives *against* its use.

I want to now turn back to Project Alltel. What did we accomplish in 1985, and what was left undone? I am convinced that the major contribution of Project ALLTEL was to sensitize the leadership of the accrediting and state authorizing communities alike that there was much to appreciate in technology-based distance learning.

Lionel Baldwin, for one, ventured into the lion's den to explain to the ALLTEL task forces how NTU functioned and why its services were at least equal to those offered in more traditional fashion. That is a far cry from the defensive posture that some distance learning programs adopted a decade or so earlier, where any attempt at regulation was met with a threat - or the reality - of a lawsuit.

There is an adage in the law that bad cases make bad law. Another way of expressing that thought in the present context is that inferior or exploitive programs are likely to result in highly intrusive regulation intended to bar the malefactors - and, incidentally, virtually everyone else out there. In the rush to build high walls to keep out the bad guys, it is rare that much thought is given as to how to ensure that the good guys are not also excluded. In the post-ALLTEL era, there seems to have been more of a willingness to consider distance learning on its merits and not as a plague to be eradicated.

If openness to distance learning is Project Alltel's positive legacy, perhaps its greatest unrealized dream lies in the standardized "Institutional Profile." In promulgating the Profile, the framers of the *Project ALLTEL Report* sought to provide a vehicle through which an institution offering a distance learning service across state and accrediting agency jurisdictional lines would be able to complete a single information form, which would be accepted by every state and accrediting agency, as sufficient to enable them to assess the nature of the program and the provider and make a judgment as to their allowability under the terms of local requirements. Unstated in the ALLTEL report, but clearly hoped for by many - although certainly not all - of the participants, was the ultimate outcome that the Profile would in fact serve as a multi-state *waiver* of the need to individually review the program and institution.

The weakness, of course, is something that has been debated by the members of SHEEO and COPA, and indeed more recently in the halls of the Congress: to what extent is acceptance by one state or accrediting body sufficient evidence of quality and adherence to accepted norms of behavior that others can safely rely on that determination? So long as institutions were firmly rooted to the ground, this was not much of a problem, since the itinerant program was a true rarity. Further, even those extended programs tended to have faculty "on the ground" in the receiving jurisdiction, thus making it logical to apply the same rules for their review and approval as for domestic institutions.

Technology-based distance learning is altogether different. The computer term W-Y-S-W-Y-G - what you see is what you get - is apt: the programming that can be received in Fargo is identical to that which reaches Bangor. In material respects it is thus easier to evaluate these programs precisely because of their uniformity. Yet there is nothing to stop every jurisdiction from applying its own requirements and measures to the program. It is conceivable that an institution providing distance learning services might be called upon to submit to fifty-one or more separate regulatory procedures. Ignoring for the moment the legal niceties of such requirements, that is an impossible burden, particularly since the requirements and measures vary substantially from jurisdiction to jurisdiction. No one state would be trying to exclude a provider, but the net effect would be to stifle the program.

It is here that the role of accreditation must take precedence, for it is only through the accreditation process, and the willingness of the states to give full faith and credit to accreditation decisions, that this kind of death by 10,000 - or in this case,

fifty-one - knives can be avoided. The accrediting community needs to develop a coordinated, coherent approach to the review and approval of technology-based distance learning, in a manner that serves the dual purposes of protecting quality while encouraging innovation in the delivery of postsecondary education. The regional accrediting bodies must come to grips with the approval of distance learning, and they must do so collectively so that a program approvable in one region would not be excluded in another. I note in passing that at the time National Technological University was approved by the North Central Association, it would not have been *eligible* for approval in three of the six regions!

To the extent this coordination is accomplished, the governmental bodies charged with the authorization of postsecondary education will have a reliable standard to which they can repair. But without such a coordinated approach, the control of distance learning will fragment, and the ultimate decisions will be made by lawyers and judges. I have no doubt that the bar and bench can fashion reasonable remedies, but I believe that the educational needs of the nation can better be served by having such decisions made where they belong and by those primarily so entrusted.

As we were in 1985, we are awaiting the tidal wave to break on our shores. The fact that it has not done so may lead some to assume that the problem has dissipated. I believe the contrary to be the case: as technologies further evolve, and as the marketplace widens, the provision and use of postsecondary education through distance learning techniques will continue to expand. One need only look at the billboards throughout Denver Stapleton Airport proclaiming the virtues of Mind Extension University to know that the force of the wave is building. The only question is whether its energy will be harnessed for the common good, or will it result in a divisive and destructive storm? Will new entrants into the field of distance learning be guided into good practice, or will they devote their efforts to avoiding burdensome regulation? Will learners have reliable indicators to judge the quality of distance learning offerings, or will they be at the mercy of the marketplace - and visa versa? To a very large degree, those outcomes rests in the hands of those who guide the process of voluntary accreditation in these United States.

* *Project ALLTEL: A Summary Report (Project ALLTEL Report)*, Bruce N. Chaloux, 1985. The "Statement on Accreditation and Authorization of Distance Learning Through Telecommunications" begins on page 58. The "Institutional Profile for Telecommunications Instruction" begins on page 66. Copies of the ALLTEL Report are available from the COPA offices for $9.50, prepaid. Quantities are limited. The "Statement on Accreditation and Authorization of Distance Learning Through Telecommunications" is available free of charge.

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■ Distance Learning and Issues of Educational Quality

Paula Hooper Mayhew

Learning at a distance, especially through the means of networked electronic telecommunications, is a relatively new but rapidly expanding phenomenon in American educational life. Since the mid-1980's, tens of thousands of students at every level of education have been engaged in learning experiences that originate far from their schools and classrooms. This explosion of telecommunicated learning presents important challenges to accreditation in higher education, among them very real jurisdictional and geographical concerns that are addressed elsewhere in this volume.

Most crucial to the present inquiry, however is the challenge distance learning presents to traditional notions of quality in teaching and learning. When pondering the need to revise our offerings better to address the requirements of distance learning, three clusters of concerns are among those that present themselves: 1) the nature of teaching as a vocation within the academy; 2) the nature of degree-program planning within higher education; and, 3) the nature of adult learning styles.

Teaching as a Vocation: The Challenge of Distance Learning

Distance learning challenges the perceived centrality of the professor in the teaching/learning process. Historically, American higher education has been most comfortable with the quality of learning experiences that occur as a result of face-to-face professorial instruction, preferably within the classroom setting. The relatively low status of correspondence education and the suspicion associated with the awarding of college credit for prior learning both attest to the continuing collegial assumption that in-person instruction is the mode most likely to result in quality education. This assumption has been challenged in many places by a variety of educational practitioners and policy-makers (see, for example, "Open Universities: Closing the Distances to Learning," Daniel Granger, *Change*, July/August, 1990), but nonetheless prevails. Further, researchers have performed social setting studies which suggest that the student achievement of some of the goals of higher education are reached by making satisfactory progress, not by specific classroom teaching at all. (An interesting example of a small study at the institutional level is, "The Assimilation of Sociology into Common Sense: Some Implications for Teaching," William F. Bengston and John W. Hazzard, *Teaching Sociology*, January, 1990, pp. 39-45.)

The tenacity of the belief in personal classroom instruction as the *sine qua non* of quality education despite evidence to the contrary is understandable when one ponders the nature of teaching as a vocation. From the Pre-Socratics on, the rhetoric and reality of the profession has always underscored the importance of the impact of individual teachers on their pupils. In more recent times, when education has been touted as the answer to virtually every social ill, the choice to become a teacher has provided an opportunity for positive social interaction and social change. The fact that change is lamentably slow in coming seems to have done little to dispel the belief that personal instruction remains the surest route to social improvement.

Clearly, many teachers feel they have a lot to lose by abdicating their belief in the primacy of personal instruction. They experience on-campus college or university

life as a satisfying, holistic experience in which one's professorial authority is supported by collegial and student esteem and the perceived sense of progress. This sense of satisfaction is especially true among the faculties of predominately campus-based institutions with traditional-aged students: adult students are more skeptical and less apt to remain on campus long enough to allow for personal professorial investment, even in classroom situations.

Obviously, distance learning is the ultimate challenge to the notion of the primacy of personal, teacher/student, face-to-face learning. Because accrediting conventions are grounded in the belief that the faculty is the center of institutions of higher learning, accrediting bodies will, therefore, for the foreseeable future, be involved in crucial interactions with a professorate that is at best skeptical - even threatened by - new modes of teaching and learning. The best prognostication suggests that professors may, sooner rather than later, learn to be more comfortable with the nature and quality of the *content of programs* prepared for distance learners. It will probably take them longer to find ways to value the professorial processes involved in creating and communicating distance learning programs and to create a reward system that promises as much satisfaction as did face-to-face instruction. Quite rightly, many teachers are afraid that the new technology is beyond them and that it will create a sterile teaching and learning climate devoted only to information exchange, a climate no longer worth a life's devotion.

Recommendation: That accreditors, as policy makers, begin to insure that appropriate review and reward systems are developed for institutions (or parts of institutions) where professors interact with students learning at a distance. It is all well and good to subscribe to accrediting standards that valorize experimentation and innovation; it is quite another to reward individuals and institutions that experiment and innovate, especially in the area of distance learning.

Degree Program Planning: The Challenge for Distance Learning

In attempting to make a case for the adoption of accrediting practices that can be used by educators to judge the quality of higher educational programs delivered at a distance, it is necessary to explore the bases of degree-program planning in American higher education. Central to this issue is the idiosyncratic manner in which both general education and major field requirements have been developed in the past and the services that may be lacking to aid individual students in degree-program planning, especially when they are, both in real terms and in psychological terms, "distanced."

General Education as the Foundation for Degree Programs

Traditionally, general education curricula (where they exist) have been based upon site-specific financial as well as educational assumptions. Namely, institutional resources can most fairly and usefully be allotted among the departments or divisions by means of a "distribution" requirement that also addresses the need to expose students to a range of academic areas. The result of this widespread practice has been to create programs modelled around the needs of the faculty and administration of particular institutions. The resulting student transcripts for general education from different institutions bear little resemblance to one another in terms of either course content or achievement level as determined by course grades.

Regional accrediting bodies have tended *not* to tackle the questions that might be raised by cross-institutional comparison when it comes to the core curriculum or general education. We have, instead, looked carefully at the mission and goals of each institution we evaluate and attempted to judge the suitability of the courses chosen to fulfill the general educational expectation, keeping in mind that:

> "The kinds of courses that should be included in general education are those which draw students into important new areas of intellectual experience, increase awareness of each individual's own cultural heritage as well as that of others, and prepare them to make sound judgments outside as well as within their specialized field. . . " (Middle States Commission on Higher Education, *The Characteristics of Excellence in Higher Education*, 1989, p. 16.)

By and large, visiting teams have been left to decide whether or not transfer students are treated with equity when bringing courses into an institution with set distribution requirements.

Distance educators, especially given the large number of students expected to be enrolled in programs-at-a-distance by the year 2000, need to work with accrediting bodies and others to determine how the system of transcript evaluation can be either augmented or replaced by emphasis upon the *learning* that should have been achieved by students who have fulfilled the requirements for general education. All institutions and their faculties would benefit, of course, from a change of emphasis in general education from distribution of resources to the accomplishment of student learning goals. Distance educators in particular would do well to follow the lead of the accrediting bodies, most of which have adopted outcomes assessment criteria, and begin to develop ways of measuring their students' attainment of general intellectual skills. Because curricular development in distance learning tends towards front-loading, questions of content or "input" may well become areas of less interest and concern to accreditors than is true at present. In the future, general education programs for distance learning will, like other educational experiences, be judged more often on outcomes or "output," an area in which there remains a good deal of work to be done.

Degree-Program Planning in the Major Field of Study

Anyone knowledgeable of higher education in America is aware of the differences in institutional expectations for the completion of the major field of study. These differences must be understood in terms of the varying histories, geographical settings, and reputations of American colleges and universities and the tradition that individual professors should have an important influence on curricular shape, development and implementation. Distance degree-program planning in the major, especially when the learner has attended other higher educational institutions, should begin to develop outcomes-based norms for student achievement that take into account individual student differences. As the student body becomes more and more diverse, it also begins to include populations that have been traditionally underserved by higher education. Even more than most, these students need degree-program planning in the major that is realistic and that takes account of individual needs and aspirations - the needs and aspirations of people with little understanding of the concepts underlying the goals and objectives of the college major other than those related to career choice.

Recommendation: That 1) accreditors, as colleagues, work to insure that distance learning outcomes assessment processes are in place and well-monitored; and, 2) degree-program planning is done with the data assembled from these outcomes assessments, keeping the needs of the individual student foremost.

Differences in Adult Learning Styles: A Challenge to Distance Learning Programs for Adults

In the past decade, a good deal of work has been done to describe differences in learning styles among adult learners. Most often explored are differences in cognitive style that flow from gender. (See, for example: In a Different Voice, Carol Gilligan, 1982; *Women's Ways of Knowing*, Mary Field Belenky *et al.*, 1986; and Paula Mayhew and Lois Muzio, "Women as Adult Learners," *Golden Hill*, 1989.) Currently under study, but more societally volatile, are differences in learning styles that adhere to race, class and age.

Because, as noted above, the creation of distance education programs relies heavily on the start-up work done to create the opportunities for learning, both in terms of technology and curriculum development, often little thought is given to the learning styles of the intended student audience. In my experience, distance learning programs can be limited by *excessive* emphasis on planning and other inputs and too little emphasis on determining who the learners will be. Higher educational offerings transmitted nationwide over PBS are good examples of courses offered with an eye to the performance of the instructor(s), the cinematography, the quality of the graphics and the lucidity of the supporting print materials, not with a sense of a particular audience. They are for "the public," which is, in ways pertinent to higher education, a concept of only limited usefulness.

Recommendation: In order to address differences in learning styles among adult learners and create distance learning opportunities that capitalize on strengths and address deficiencies, distance educators 1) need to know more about the cognitive development of their adult students; and, 2) should begin to develop learning opportunities shaped to their needs.

Conclusion: The Promise of Quality in Distance Learning

Clearly, the academy has been slow to stretch its imagination to encompass the possibilities inherent in telecommunicated higher education for adults. Understandably, professors and administrators alike have been loathe to question cherished paradigms focused on face-to-face instruction, institution-specific curricular programs, and the essentialist view that intellects develop without reference to class, gender, or race. Accreditors will continue to encourage innovation and to work, as colleagues, towards the establishment of new paradigms that will, over time, encourage the characteristics of excellence that are appropriate to distance learning.

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■ Accreditation and Authorization Issues

Kate Gulliver

The symposium on "Emerging Critical Issues in Distance Higher Education" brought together accreditors, representatives of state approving agencies, colleges, organizations, and employers. Considered were issues of quality, educational needs to be served, and policies and procedures that will, as one participant put it, make it easy for the good programs to operate and impossible for the bad ones to operate. The particular mix of program and participants in that Symposium worked, and out of it came several specific recommendations for action which were built on ALLTEL and are being implemented.

First, an assumption with which we began: distance learning and technology are not synonymous, despite the fact that the three fine state-of-the-art programs we saw yesterday all make heavy use of technology. For some more academic/pedagogical definitions of distance learning, see Dan Granger's article "Open Universities: Closing the Distances to Learning," in *Change*, July/August 1990.

All of the constituents in the Symposium have a concern with quality in distance education for different reasons:

- *Accrediting and approving agencies*, because it is a growing part of their job (much to the dismay of some).
- *Colleges and universities*, because each of their programs affects their institutional reputation, and, I continue to believe, because most colleges want to give students a good learning experience.
- *Employers*, because they get the results - the employee. In many cases they are paying for the education, and they want their money's worth.
- *Students*, although, as Mike Goldstein has pointed out, students have two goals, the learning and the credential, and often they are less able to judge the value of the learning experience than of the credential.

Some key issues are:

- Should distance education be judged by its equivalency to classroom-based education, or by some other standard?
  - Is that equivalency a *given*, or something to be *proven* by research and practice?
  - What do we really know about the quality and effectiveness of what takes place in the classroom? (Kevin Reilly: "You can't answer your question (re: distance education) until you answer mine (re: classroom).")
- Who is responsible for assuring quality - accreditors, state approving agencies, colleges? Is there trust between them?
- What are the special issues that distance learning raises?
- Is it technology that is driving the current concern about distance education? I remind you that a form of distance education has been prevalent in the United States for over a century without raising undue concern and that is correspondence/independent study.
- What happens when a distance learning program crosses the border into another state or region?

- States do not currently recognize one another's program approvals.

As Bud Hodgkinson has stated:

> "Local, state, and national boundaries are more permeable than they've ever been before. The permeability can only increase, as I show you a couple of cities that have moved across state lines...It's very hard to tell them to get back across the river where they belong. About thirty-five percent of the St. Louis metro area is in Illinois. Seventy percent of Omaha is in Iowa.
>
> Think about the abilities of accrediting agencies and local licensing agencies to stop things at the state boundary. The job of accreditors and evaluators, which is to maintain quality at political boundary points, is not entirely supported by the demography of the United States."

- Accrediting agencies do recognize the accreditation of distance learning by the organization in the area of origination, although sometimes with visible discomfort. But differing standards and approaches among accrediting bodies create what Steve Crow has called and "uneven playing field." Perhaps, as Mike Goldstein has suggested, accreditors must take the lead in establishing common standards and approaches.

Initiatives begun at the Symposium to address these issues:

- Establishment of a Task Group to develop principles of good practice for distance higher education, taking as their starting point the principles developed by the American Council on Education and The Alliance for alternative and external degrees.
  - The Task Group has some fifteen members, including accreditors, state regulators, colleges, employers, and "brokers." We invite additional participants. We will develop models or case studies like today's, to which we will apply the principles. We will work with states and accreditors to adopt them in their work.
  - More emphasis should be placed on the use of outcomes assessment, and on the development of measurable objectives for measurable outcomes.

- The beginning of a cooperative agreement involving states, and, we hope, eventually accrediting bodies, to adopt a common base of information for program review to recognize another's approval as the basis for their own review. This is not an attempt to impose standardization, but rather to establish a common "floor" of acceptable practice.
- The development of a research and policy agenda for distance higher education. The second symposium on research in distance education, to be held at Penn State University in May, should help to establish this agenda.

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■ The Impact of Distance Learning on the Process of Accreditation

June Lester

The philosophical and theoretical considerations of incorporating distance learning into accreditation and accreditation standards are outlined elsewhere in this volume. This paper will comment on the impact of distance learning components on various parts of the accreditation process, specifically the self-study, the site visit, and interim monitoring procedures. It will raise questions that need to be addressed, although there is no promise to provide the answers.

Self-Study

In the self-study process and particularly in the construction of the self-study report, a major question is how distance education is to be incorporated. That is, will distance learning components be integrated throughout the report or treated separately, in a distinct part of the report. The appropriate answer derives from the philosophy of accreditation of the particular accrediting body. Is the distance learning program considered a component of the whole or is it a separate element? The answer should relate to the treatment of separate sites and to the determination of when a site becomes an entity that must be separately accredited. For example, the American Library Association does not accredit separate sites for a program, but rather considers the program as a whole, regardless of where or by what means it is delivered. Should the approach be to accredit separate sites and if the entire program is delivered in a distance learning mode, it conceivably would be separately accredited.

The guidelines for the self-study report need to be written so that it is not implied that "on campus" is the norm and components delivered otherwise, whether in weekend intensive format or some form of electronic delivery, are an aberration. That being said, however, there is another consideration. Is there need to report separately resources for distance learning in order to demonstrate that the program or institution has adequate resources (human, financial, physical) to accomplish the purposes of the distance learning component? Should focused evaluations be part of an agency's accreditation process portfolio, distance learning would be a likely candidate for that type of self-study approach.

Site Team

The choice of site visitors/evaluators for a program or institution with distance learning components poses a second set of challenges. First, one needs to ensure that there are visitors who are knowledgeable about distance learning concepts and familiar with the variety of delivery modes. Second, the accrediting body needs to determine what stance to take in composing the site team. Does one try to ensure that visitors are neutral toward distance learning components, select only those that are sympathetic with distance learning, or try to find some who are supportive and some who are negative and attempt to strike an appropriate balance on the team?

In the training program for site visitors, distance learning delivery issues need to be incorporated into the training sessions. Flexibility in site visit procedures for gathering information should be emphasized. The challenge of designing ef-

fective training that incorporates distance learning relates to the broader concern for educating Committee or Commission members on distance learning. One obvious way in which this might be approached is through using distance learning as part of the training program, so that the site visitors have first hand experience with one or more distance learning modes.

The Site Visit

The basic question for the site visit is how do you translate a process that was designed to evaluate a bricks and mortar environment into one that works for distributed sites that include one person's living room and another's kitchen? In fact, one could ask whether the site visit is a viable concept in the distance learning environment. Perhaps this question has different answers, depending on the type of delivery.

However, in order to address specifics we can circumvent the problems by asking two general questions:

- What is the purpose of the site visit?
- What information is gathered during the visit that can only be obtained in that way?

The basic purpose of the site visit is to enable the evaluation of the institution or program in the context of the learning environment. The question then becomes, "What is the learning environment for distance learning?" We tend to think of the learning environment as composed of a complex of geographically centralized physical (buildings) and human (faculty, students) resources. This definition of the learning environment obviously doesn't work for most distance delivery modes. The learning environment, which becomes physically distributed, has as key elements supportive and responsive intellectual access to the learning facilitators (faculty), fellow learners (students), and information resources.

A second reason for the site visit is that it is an efficient way to conduct the interviews of board members, administrators, faculty, students, graduates, and employers that constitute a major means of data gathering by the evaluators. How does this change in distance learning? Is a visit to the site of administration of the distance learning component necessary? Sufficient? What is the most efficient way to interview faculty, who may be distributed geographically over several states, or the entire country? How does one efficiently interview students? As with the training of site visitors, one of the answers obviously can be through use of the same kinds of systems used in distance learning: electronic mail, computer conferencing, two-way video and audio, and the plain old telephone.

A third activity of the site visit is observation of the quality, availability, and utility of physical resources. How do we translate those on-campus physical resources into their comparable entities in distance learning? What is the equivalent of the student union? Of the classrooms? Of faculty offices? Of computer labs? In considering these issues, one could conclude that the real questions are

- What is the quality of faculty and student life, and
- How accessible are supporting learning resources?

These questions then raise others:

- To what extent should or can the institution be responsible for the quality of a student's life in distance learning?

- To what extent should or can the institution be responsible for providing the necessary access tools (i.e., the pc with modem, the VCR, subscription to cable) for distance learning?

Yet another reason for the site visit is to observe instructional delivery and interaction. Quite obviously, this activity translates easily into the distance learning environment and, in some instances, can be accomplished without the site visitor ever leaving home!

Examination of records and documents is another key activity of the site visit. Even in the distance learning environment it is likely that this component could be accomplished centrally at the place of administration. However, one can go beyond that approach and posit that if such records are available in electronic format and accessible through the Internet, this portion of the site visit might also be done from the site visitor's home. Student papers and projects, likewise, could be accessed centrally - or better, electronically, providing another "distance learning" experience for the site team.

Evaluation of the library and other information resources, typically done in the site visit through random sampling of the holdings of the library or libraries on the home campus, translates well into the distance learning environment. The real concern, regardless of whether one is dealing with distance learning or delivery on campus in traditional format, should be ease and speed of access, not ownership, to the information needed in support of teaching and research.

Evaluation of student support services may need to be redefined for the distance learning mode. How easily accessible are advisors (are there 800 numbers, electronic mail)? Are support services available, e.g., for counseling, for day care? As with the question of physical resources, one has to ask what are reasonable expectations of the institution's responsibility in these areas for distance learning students.

Interim Monitoring

For most accrediting bodies, if not all, there is some form of interim monitoring that occurs between regularly scheduled full-scale reviews through required interim reports on specific matters, annual reports, and similar procedures. For distance learning, accrediting bodies may require reporting prior to or immediately after implementation of new or significantly enhanced distance learning components. Such reporting requires changes in forms and procedures to accommodate the variety of delivery modes. In addition, experience with distance learning suggests changes in the way authorization is worded. That is, rather than saying a program is delivered at specific sites, it may be more appropriate (and efficient) to note that it is delivered in various modes in a general geographic area, such as "other states."

Data forms generally need rewording to accommodate distance learning components. For example, "library holdings" for distance delivery sites require a different way of measuring. Instead of numbers of volumes held or current serial subscriptions, the measurements should be in terms of access time, the user friendliness of the access system, and the delivery time for faxed materials.

Other Aspects

There are two other aspects affected by the presence of distance learning - the

review cycle and *cost*. The underlying premise of a five-, seven-, or ten-year review cycle is an assumption of relative stability of programs and institutions. Rapid changes in distance learning delivery technologies call this assumption into question. Depending on the way various questions are answered and how distance learning is incorporated into the site visit, costs could increase. Conceivably, though, costs could be reduced, if we learn new ways to accomplish some of what is now done in the onsite visit.

Overall

Overall, the presence of distance learning increases the need to evaluate based on process and outcomes, rather than inputs. Distance learning forces us to examine the purposes of the various parts of the accreditation process and to ask:

- Why are we doing this?
- What is this procedure supposed to accomplish?

In finding the answers, we likely will find improved ways to conduct the site visit in the bricks and mortar environment and expand our concept of what constitutes the process of accreditation.

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■ Distance Learning: Issues from the Perspective of a State Authorization Agency

Timothy M. Grieder

Let's begin with some elementary questions:

1. Does the state actually have authority over distance learning transmitted from another state (or country)? Perhaps not, unless physical presence is manifest and states are allowed to take a liberal view of what constitutes physical presence.
2. In regard to distance learning over which states have authority, on what evidence and criteria could a state judge the quality of distance learning programs? Would a state have access to data? Could states require sponsoring institutions to present data? Would data provide the needed information? Can states depend upon institution-generated outcomes reports? Would they be reliable? Can the sponsoring institutions be held responsible for their own assessment? (Not all of the institutions would be accredited.) What procedures could be used for a new institution that has no students and no track record?
3. What is state authorization supposed to signify? If it is supposed to signify institutional credibility, or quality, what is accreditation for?
4. Should states (perhaps admitting their lack of regulatory authority) let market economics prevail and allow sponsoring institutions and organizations free rein to seek a market for their programs?
5. What are the long-term implications for society resulting from distance learning that is basically free to operate: implications for resident institutions, for accrediting associations that are part of the traditional quality control mechanism, and for the consumers of education?

There are two situations in which states interact with distance learning sponsors. One is when the institution is based in another state and plans to export distance learning programs. The second is when the institution is based in-state. In the former case, state regulation is problematic and there is some confusion about what states have the authority and resources to do.

In the latter case, the state may have authority, but the questions remain about the evidence that can be marshalled and the criteria that could be used to judge distance learning that would not even be conducted within the authorizing state. The state could look at the organization and the infrastructure of the institution, but it would not receive a complete picture. It is not known what processes states use to authorize institutions to deliver distance learning in their own states; and authorizing officials may not even know what is to be delivered out of their states by either public institutions or authorized private institutions.

Concerns have been expressed that state regulation blocks or impedes the development and use of technology. This view is challenged below.

The following is a list of worries about distance learning that is sponsored by out-of-state institutions:

1. The quality of instruction will be poor.

2. The sponsoring institution will be a diploma mill or fraudulent.
3. Complete, or promised, programs will not actually be delivered.
4. The programs will compete with those of state institutions.
5. The programs will be disruptive to state higher education planning.
6. Credits that student might earn will not be transferrable.
7. The state will not have the authority to regulate the programs, either because there will not be physical presence in the state or because the sponsoring organization will be calculating and unethical.
8. The sponsoring organization could prove to be troublesome to the state, necessitating onerous administrative actions and possibly culminating in lawsuits.
9. A show of state inefficiency and ineffectiveness could encourage other poor programs to enter the state.

The following is a list of worries about intrastate distance learning that is sponsored by in-state institutions:

1. There is no logical basis for dividing the territory in a state for institutional "service areas." Technology does not respect boundaries.
2. Popular programs will be those that many institutions offer. Unless there is some coordination, competition and duplication among distance learning programs will be difficult to avoid.
3. Giving one state institution the franchise for distance learning is possible, but it could keep all other institutions in that state in the twentieth century (unless, of course, they are still in the nineteenth century). This approach might work better if there is a single education system in which institutional roles are assigned by one board.

Concern has been expressed that states, through their regulations, would somehow block the development and use of technology, or at least, would slow it. However, responsible organizations are moving ahead and technological developments are rapid. Here is why "encouragement" through lax state regulation is not needed:

1. The public will ask for telecommunications-delivered instruction if it is believed that it will meet their needs.
2. Private enterprise will ensure that technology is used. Private institutions and organizations, hardware manufacturers, cable companies, and the telecommunications utilities will help to ensure its use.
3. In the long term technology will win out. Technology has always advanced, even if we, the public, aren't ready for it. A technological gap probably exists today.
4. Reputable higher education institutions have brought into or are buying into distance learning.
5. Should states adopt uniform statutes and regulations to encourage the use of technology across state lines? Why should they?
   (a) When no physical presence is involved, states probably do not have regulatory authority, anyway;

(b) Is there *any* rationale, or merit, for a state to encourage institutions based in that state to deliver distance to *other* states?

(c) Encouraging high quality programs by easing state policies also allows not-so-reputable programs to enter under those same policies.

The long-term implications of distance learning are many and varied:

1. Distance learning provides a wide choice of learning opportunities; the possibility of competitive pricing; all the advantages of not leaving home to take courses.
2. There are many competing distance learning sponsors, both of good and bad quality.
3. Sponsors, by avoiding a physical presence, might also avoid student support services. Some sponsors might become parasites on local campus services (like libraries). This already occurs.
4. There are potential negative consequences for resident institutions.
5. Without state regulation of much distance learning, accreditation might be disregarded, as well. Where will quality controls be?

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■ Distance Learning: Implications for Accreditation

Steven Crow

The growth of distance learning should force us to question our basic assumptions about how and where higher education must be conducted. If we conclude that quality higher education takes place in physical environments we call campuses complete with up-to-date laboratories and volume-laden libraries; if we conclude that quality higher education takes place in classrooms directed primarily by full-time faculty who with their faculty colleagues create the total curricula offered on the campus; and if we conclude that quality higher education requires that students, although tested and evaluated for individual knowledge must interact with other students both within and without their fields, then we are probably going to have some significant problems adjusting to the impending technological revolution in higher education. If these conclusions inform our accrediting standards or criteria, then we might as well admit that we accreditors remain committed as much to resource and process measurements of higher education as to measurements of educational effectiveness.

At this point, let's acknowledge that institutions of higher education and the programs within them have missions beyond the primary one of educating students. For scholars and their students, colleges and universities are meant to be places that reward creativity and protect and encourage free inquiry. They also are meant to be places where new knowledge is generated; not just disseminated. Many colleges hold high the mission of inculcating values, whether they be secular or spiritual. The critical importance of these broad elements of institutional missions must not be overlooked in all of the talk about the student-centered, learner-centered potential of new forms of distance learning.

But the fact remains that for most of us, whether we are institutional or specialized accreditors, our standards or criteria are based on spoken or unspoken assumptions that quality higher education takes place in an environment and in a mode fairly similar to the ones we experienced in our own educations. Some accrediting associations are quite clear about this, while others use somewhat less precise language. For the sake of argument, I will suggest that most of us are here today not because we see in distance learning the possibility for a radical recasting of higher education, but because we see in it a deviation from the norm. Our standards and criteria capture in language, sets of expectations for traditional, campus-based learning. If we have a standard or criterion related to distance learning, it typically uses traditional, campus-based learning as the yardstick against which the distance learning is measured.

These basic assumptions as captured in our standards and criteria have some direct implications for our approach to distance learning.

1. *We apparently locate distance learning within campus-based, traditional institutions that offer traditional programs.* First we posit the necessity of a campus. As June Lester has already pointed out, in doing our accrediting work, we visit campuses where we expect to find the administration, the faculty, the students, all of the educational programs, and the bulk of the educational resources. Can a campus be a dispersed campus and still meet our standards or criteria? Second, we suggest that only institutions with strong traditional programs should engage in distance learning and then only to enhance access to the traditional

educational program. If quality higher education takes place in a campus environment, then all distance learning must be measured against how well it compensates for the lack of that environment or how well it recreates that environment.

2. *We apparently assume that our traditional institutions and programs have proven, documented means of showing their educational effectiveness.* If that were true, we wouldn't be spending nearly as much time and effort as we are introducing the whole concept of assessment into the accrediting processes. When I participated on the panel in Albany,* in November, I was struck by the consensus even among those staunch supporters of distance learning that effective outcome measurements do not exist. "We measure whether distance learners receive grade point averages equal to or higher than campus-based students," one participant noted only to add quickly, "but that is not a very strong measurement of effectiveness." She's right, but our standards and criteria continue to posit the effectiveness of campus-based instruction as a baseline measurement.

3. *We apparently place in the hands of the current classroom faculty the definition of quality higher education.* While it is possible that more and more faculty are becoming computer literate, even developing educational software for their students, large numbers continue to eschew technology, failing even to ask whether it could enhance their teaching. Robert Kozma and Jerome Johnston, in their recent article "The Technological Revolution Comes to the Classroom," say that probably only five percent of the national faculty are technological pioneers. (*Change*, January/February, 1991, p. 10). So we build into our evaluation of programs significant components of technological illiteracy - perhaps even significant components of suspicion about technology and distance learning.

In and of themselves, however, these assumptions are not bad ones to hold. Education is an inherently conservative enterprise. The goal is to preserve and value knowledge and to further the progress of humankind through the transmission of knowledge. Traditional campuses and traditional classrooms are hardly as bankrupt as many would allege. But unless we are willing to see these assumptions for what they are, unless we are willing to question their very universality, I think we are ill-equipped to deal creatively and responsibly with the changes we are going to face in higher education, changes that will involve technology and distance learning. Let me suggest three issues as examples:

1. *Accreditors are going to have difficulty accepting and working with new types of institutions or programs that are shaped by the new technologies.* National Technological University is not going to be the only institution shaped by the possibilities opened up by technology. National and international corporations serious about the professional development of their employees are turning to technology and distance learning formats much more rapidly than are educational institutions, and they are convinced of the effectiveness of their efforts. Out of them, if not out of the traditional educational community, will emerge new institutions and programs. We will face the challenge of acknowledging that quality higher education can take place through new types of institutions and programs worthy of accreditation or we will try to perpetrate relatively intact the academy as it exists today.

2. *Accreditors will have difficulty coping with consortial, shared, or purchased programs made possible through technology and distance learning.* By assuming the centrality of the home campus and its ownership of its total educational program (usually we define that not simply as a vote by the faculty but also by the presence on the faculty of people who teach in and monitor the program), we will be ill-prepared to deal with a whole new emerging type of educational program: one shared by a variety of institutions and really owned by none of them. This might well present fewer problems for program accreditors, but it constitutes a real headache for institutional accreditors. Yet already cost-conscious states are turning to interactive TV, videotape, and other technologies to allow wide access to some programs while not duplicating faculties and resources on each campus at which the program is available. If students can gain access to quality education offerings through a variety of routes - through their computers, TV sets, and VCRs - then more and more educational institutions will have to become brokers of educational opportunities rather than owners of them. Moreover, it seems likely that some institutions, instead of trying to mount their own programs, would in fact be wise to buy into distance learning programs, thus assuring a breadth of offerings on the campus that they simply cannot afford to provide by themselves.

3. *Accreditors will have difficulty dealing with the disappearance of boundaries.* Again, this probably presents more problems for regional accreditors than for national and program accreditors. I have already suggested that program and institutional boundaries might well become fuzzy, but the first boundaries to fall will be political and regional. Population densities do not honor state boundaries; there is no reason for them to honor regional accrediting boundaries, either. Moreover, with uplink and downlink capacity, courses can be beamed almost anywhere, even across oceans. At the very least, the accrediting community should begin to see this challenge as a national and international challenge, not one for seventy different agencies to wrestle with and interpret separately and differently.

Just for the sake of stirring up discussion, let me flip my discussion on its head for a minute. I have been saying that our current standards and criteria reflect an assumed orthodoxy about higher education and that technology and distance learning probably will challenge significantly that orthodoxy. I have a radical solution to resolve some of the matters: why wouldn't it be appropriate for an accrediting association to require that affiliated institutions and programs, in order to strengthen themselves, continually investigate and evaluate the potential of technology and distance learning? Instead of treating distance learning as sort of a step-child, one marked by lack of real quality, what if we were to see it as a way to enhance the basic resource base of an institution? In short, we will develop yet another standard or a variation of a criteria: "An accredited institution (or program) continually reviews the new resources open to it through technological advances and within its resources will incorporate them to enhance its educational programs and the access of those programs to its students." We have started to make that transition already in our approach to information services and libraries, valuing highly the access of useful information networks, sometime even over the acquisitions of more volumes. Is it time for us to look carefully at our frequent recommendations that

institutions and programs invest in more faculty and/or faculty development? Is it time for teams, instead, to encourage linkages with computer networks, to encourage the wiring of dorms for access to cable, to encourage installation of downlinks, to propose more consortial and shared programs? Probably. But the fact is, so few of us have any idea of what we are talking about and such strong reservations about turning our world over to the educational technologists, that we will probably back into the twenty-first century, establishing precedent on a case-by-case basis. I sincerely, hope that the cases don't occur with such speed that we are overwhelmed by them or worse yet, that we respond by trying to stop change.

* Invitational Symposium on Distance Higher Education, November 28-30, 1990, Albany, New York.

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■ Summary: Distance Learning and the Implications for Accrediting Bodies and Accreditation

Allan O. Pfnister

I want to focus this summary of today's program on distance learning and accreditation on the possible implications for accrediting in a very broad sense. It is not my task to critique what elements are required in distance learning but rather to raise some questions about what are the implications for accrediting agencies, both the regional agencies and others.

I will begin with the general question: Is distance education presenting a new challenge? I must respond by saying accrediting agencies have never lived without challenges. A few weeks ago, in speaking to another group, I said that, if anything at all characterizes accreditation and accrediting agencies, it is that they are inventive. They have to be. From the beginning they have had few, if any, models; the accrediting agencies have adapted their approaches to the constantly shifting higher educational syste , inventing new standards, new procedures, and new functions. By way of illustration I looked at the North Central Association and its Commission on Higher Education and discovered that from 1896 to 1909, in less than a decade, NCA changed from a discussion group to an accrediting agency which decided to determine educational quality by assessing the characteristics of schools rather than students themselves and finally decided in 1909 to accredit colleges as well, under some initial protest. Then the Association had to decide whether junior colleges and teacher training institutions were really higher education institutions and whether they would be included in the accredited list. And so it proceeded through the years, questioning again and again the foundation of its own accrediting criteria, building new criteria, new procedures, and new approaches.

So in answer to my own question, I suppose I would say: When has accrediting been without a challenge and when has it not had to be inventive? And yet, perhaps the question we face now in distance learning is of the new order. Do we face a new order of challenge? Past modifications have mostly been responses to different kinds of institutions. But we are now faced with the question of whether or not in some distance learning situations there is even a physical presence, an identifiable institution, to be examined. Let me try to make some distinctions.

To organize my thinking about distance education, I have built in my own imagination a three dimensional 3 x 3 x 3 matrix as a way of analyzing what we've been trying to say in this conference. Of course, distance education, as such, is not new. I recall I wrote a position paper for the accreditation on correspondence education some thirty years ago. But there is today an important new element: the rapid development of technologies with all of the attendant problems and potentials. These technologies brought new challenges.

Let me make two sets of distinctions and set up the first matrix 3 x 3. First of all, in terms of the impact of technologies, we have to distinguish between three aspects: delivery systems, access, and certification. And then from another perspective, we make the second set of distinctions. The second set of three aspects refers to providers: the traditional institution with non-traditional programs, the non-traditional institution, and the non-institutional provider. If you can think of

the three impacts of technology - delivery systems, access, and certification - as the vertical, and the three providers, the traditional with non-traditional programs, the non-traditional institution, and the non-institutional provider as the horizontal, you have the outlines of my matrix.

Think then if the first aspect, the delivery of system, of technology as both a driving force and a delivery system. Michael Goldstein suggested that, in a sense, the delivery system represents a neutral kind of distribution of education. I would question that. Does not the delivery system become a force that shapes the material in very significant ways? At least we have to raise the question of whether or not the delivery system is neutral. It seems to me that the delivery system shapes and reshapes the material used by 5 percent, which I think is the figure that Steve Crow mentioned, of faculty who make use of technologies. Isn't the material which they use significantly reshaped? Chemistry by computer, for example. Is it really the same sort of chemistry as chemistry in a laboratory? It seems to me that for both the on-campus activities and distance learning we need to determine whether or not delivery or the mode of delivery is really neutral and whether it needs to be examined much more carefully in terms of the kinds of impact it may have. Perhaps we should do as Steve has suggested and require that institutions at least explore the possibilities of the impact on education of the new technologies. There are special concerns about quality, about the character of the instructional process, cost, overall impact upon the teaching/learning situation.

Let us look at the second aspect, the matter of access. It seems to me that this is where the new technologies have had as much of an impact upon not only distance learning but all learning. With particular reference to distance learning however, with access being as widely open as it is, who or what is the student, is one of the first questions I would ask. Is a student one who simply accesses the material by computer, television, or whatever? Or, is a student one who is authorized by someone or some organization to access and submit for credit the result of accessing the material? Who or what decides who is a student? Does one have to be admitted by an institution? Or is the student one who pays a fee to a provider? Is a student one who meets certain requirements set up by someone? In many of the discussions this afternoon the reference was made again and again to adult students but are we thinking of the wide access made available through the technologies only in relation to the older adult?

Easy access made possible by technology also raises all sorts of questions about the quality of programs made available. What kind of program planning is underway? What kinds of new sequences are being developed? What is the implication of developing what are referred to as individualized programs? What are individualized programs? What determines the quality of such a program? What is the basis of comparison? Or, do we need a basis of comparison? What, if any, support services are required? Do we need traditional counseling? New methods of counseling? New ways of communicating back to students from a distance? What kind of recordkeeping? What kind of standards? Transfer credits? Records? What happens when the access is simply provided by the contracting college or others?

All of these issues were mentioned in the course of our discussions, but it seems to me the new technologies have created a radically different environment for learning by changing the mode of access to information, the form of interaction, the development of new skills, and the kind of knowledge derived in the process.

We turn now to the third aspect: certification. What is being certified from the point of view of the new technologies? Are we certifying the course or a sequence of courses? Do we certify the content of the presentation? Do we do this by looking at the syllabi or at the origin of the material? Is the material better if it is originated by "regular faculty" or if it is developed by contract by experts? Is distance education simply transmitting a course that is being taught on campus anyway, in effect, a video?

Or, are we simply certifying outcomes, information, and skills of the students? That seems to be the simple way of dealing with the other matters. We don't have to worry about who put the course together, how it was put together, even how it was presented. All we are concerned about is the outcome, or the outcomes, the information or skills that are attained. But, who determines the quality of the content of the outcomes? Is this a matter that every degree-graduating institution, nearly 2,000 of them, will have to determine individually? Or should there be some designated degree-granting entity, perhaps a variation in the U.S. of the British Council on National Academic Awards that looks at and qualifies exams, syllabi? Or do we need to reproduce Empire State Colleges throughout the country on a regional or national basis?

I have to be careful when I refer to assessing outcomes, because I am all for assessing outcomes. But this becomes an easy out by saying that we solve all of our problems by placing the emphasis upon outcomes. We must look carefully at what kinds of outcomes, and who is going to do the assessing, and how skillfully.

The issue then becomes, who will certify the quality, whether it be of the presentation or the outcomes. Accrediting agencies? It might be better to have some six accrediting agencies determining the quality of the outcomes and setting up the standards rather than having 2,000 individual institutions try and make that decision. Or, perhaps we should leave it to the fifty-plus state agencies, the employers, or the provider, the person who puts together the program and sells it. I think we have to look very carefully at this matter of certification. The open access of the new technologies requires us to consider who will certify the consequences and under what circumstances.

Now we take each one of these aspects: access, delivery system, and certification and set them against another set of terms, the providers. It seems to me that the circumstances under which the educational process or processes are undertaken also have some consequences for the way in which we respond. In much of today's discussion we have assumed that most of what is going on is under some sort of traditional auspices, a definable institution. But, are there not also non-traditional institutions, and non-institutional providers?

Consider first the traditional institutions with non-traditional programs in terms of access, delivery and certification. This kind of provider might be, in terms of the task of the accrediting agency, the easiest group to deal with. After all, we can probably adapt to these new programs in traditional institutions the self-study, the way in which we select teams, conduct site visits, i.e., the decision-making process involving the commission or sub-committees. We could probably deal with the issues that June Lester raised whether the non-traditional should be viewed as an integral or separate part of the institution. We can decide what kind of site teams to use. We can decide on the qualifications of the site team, whether these be simply generally knowledgeable people or professionals. One of the things that

I have observed among accrediting agencies is that we try to back away from the idea of having professional evaluators because we feel that some how or other the informed amateur is the best kind of examiner. Is that really the best way to proceed?

What about the process of the visit itself and the report? I think we can probably take care of that easily enough by some adaptation of our standard procedures as we deal with non-traditional programs within traditional institutions. And even the decision-making process that uses the commission or sub-committees can adapt to this setting.

What happens however when we go to the second group of providers: the non-traditional institutions? Here, the kinds of adaptations that the evaluation process may have to make may be more pressing. What kinds of adaptation are required? What kinds of expectations? Here we begin to reexamine what is needed for a group to qualify as an organization. What elements are needed in order to identify a non-traditional institution as an institution? We may need to look at our whole theory of organizations. The elements of an organization are: (1) people, (2) in an interactive structure, (3) with resources, (4) able to adapt with, (5) a sense of purpose. How do all of these terms relate to a non-traditional institution when we are used to relating them to traditional institutions? And what types of outcomes should we expect of non-traditional institutions. Some of the non-traditional institutions, it seems to me, get caught up in feeling that the outcomes must be precisely the same as the outcomes in the traditional institutions. Someone mentioned "comparability" in the course of our discussions today. Should the institutional forms really be comparable? Perhaps non-traditional institutions should not have comparable results. I think that is another question we have to deal with.

But then the real problem comes about when we are dealing with the third group, the non-institutional providers. The question is one of what is the acceptable definition of the physical presence of the provider. What kinds of expectations? What kind of responsibility? What we are dealing with in a non-institutional provider? An office? A transmitter? A complex computer? How do we control a non-institutional source of programs?

Let us put together the 3 x 3 matrix dealing with the items I have mentioned here. If we take access, delivery system, and certification and put those aspects over and against the providers, traditional institution with non-traditional programs, the non-traditional institution, and the non-institutional provider and look at the various cells of the matrix, we have put together at least a basis for raising the kinds of questions that need to be raised as the new technologies face accrediting agencies with new challenges.

But I said that I have developed a three dimensional matrix. So let me give you the other three elements and you can set these over and against the six that you already have. On this side are (1) accrediting associations as one group with responsibilities, (2) states as another group with responsibilities, and then, (3) with due deference to Michael, the lawyers, of course, as another set with responsibilities.

Looking at the accrediting agencies, one of the things that we may need to do, once again, is ask what is the real responsibility for the accrediting agency? What is its function? I used a couple of weeks ago some examples from a scheme that Blau and Scott had put together in which they characterized associations or organizations under four categories: mutual benefit associations, business concerns,

service organizations, and commonweal organizations. Accrediting agencies have been characterized by all of these forms.

Most accrediting agencies began as mutual benefit organizations. They were organized for the benefit of the members of the organization. They worked together, discussed, and developed needed approaches. After a period of time they seemed to develop almost into business concerns, where the primary power shifted to the simple offices which controlled and directed the operations. Later, and certainly among the regional agencies as we moved into the 1950's and 1960's, a high degree of emphasis was placed upon service to the members. As we became involved in all sorts of responsibilities to the public, we then became a kind of commonweal organization; commonweal organizations are those in which the benefactor is the public at large. To some extent these forms create a kind of schizophrenic situation. An organization which is a service organization and also a commonweal organization is concerned not only with service to the members but service to the public. I think that most regional agencies have been able to balance these two demands. But insofar as regional accrediting agencies are concerned with their relationships with the public at large, there are inevitable conflicts between service to members and the public.

Considering accreditation agencies from another perspective, historically, regionalism has been important because it has allowed the development of unique and different approaches. I don't think the regional agencies would be as strong as they are today if there hadn't been the regional emphases. But what part does regionalism play or will play in the future as these agencies have a responsibility to the public at large in education which is not limited by region, but national, even perhaps international in scope.

The second group involved are the states. There are inter- and intra-state interests and concerns, as are the legal interests of the states in maintaining control. I think there are some real issues ahead in the way in which the regional accrediting agencies and other accrediting agencies as commonweal type of organizations must relate in significant ways to the states and, indeed, to the country at large. Or, as Michael warned us, if we can't put things together then the lawyers and the courts are going to have to do it. I have confidence in the regional and other accrediting agencies that there is a deep enough concern in the ability to deal even with my three dimensional matrix to begin to put it together. But there are some serious questions that need to be answered.

All of this concern over how to deal with distance education leads me to ask whether there is not a larger consideration. Perhaps we are entering a time when new paradigms of the teaching/learning process need to be developed. Or, perhaps, technology is forcing on us new paradigm, whether we are consciously aware or not. Technology impacts not only on distance learning but on traditional institutions as well. I think this issue is much larger, though it was generated by our concerns with distance learning. What technology has made possible, is that much of the learning can be distance learning. So that the issue is not for distance learning alone but for all learning and all educational processes. I begin to wonder whether some new paradigms are emerging and whether as accrediting agencies we must begin seeing how we might deal with them. It forces us again to look at the role of the associations, the standards and the procedures. Everything might be up for grabs!

But I also have to say that higher educational institutions have multiple roles and I am not sure that technology is going to answer all the questions nor change all of education even though it has a profound impact upon many aspects. We still are going to have to conduct certain kinds of research, increase knowledge, develop new approaches, as well as provide knowledge to those who wish it. I guess the final question that I have as I have been listening to the discussions today and have attempted to summarize here: will accrediting associations be able to encourage the further development of technology and the paradigms of teaching and learning? Or, will we find it so difficult to deal with the new technologies and with the new paradigms that we will resist? If we do the latter we may find ourselves in the long run playing a decreasing role in ensuring what we as accrediting agencies have set to do: to improve and foster quality in education.

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